



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.env.nm.gov



BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

September 27, 2018

Mr. Bill McCuaig, Executive Director
Sacramento Camp & Conference Center
P.O. Box 8
Sacramento, NM 88347-0008

**Re: Sacramento Camp & Conference Center; Minor; Domestic WWTP; SIC 4952; NPDES
Compliance Evaluation; Sacramento Camp & Conference Center; NM0028886; August 29,
2018**

Dear Mr. McCuaig:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

Sacramento Camp & Conference Center; NM0028886

September 27, 2018

Page 2 of 2

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at 505-827-0596 or at Jennifer.foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Mike Kesler, NMED District III by e-mail



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="8"/> <input type="text" value="8"/> <input type="text" value="8"/> <input type="text" value="6"/> 11 12 <input type="text" value="1"/> <input type="text" value="8"/> <input type="text" value="0"/> <input type="text" value="8"/> <input type="text" value="2"/> <input type="text" value="9"/> 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="2"/>	Remarks				
<input type="text" value="M"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="O"/> <input type="text" value="R"/> <input type="text" value="W"/> <input type="text" value="W"/> <input type="text" value="T"/> <input type="text" value="P"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69	70 <input type="text" value="3"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/> <input type="text" value=""/>	74 75 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 8/29/18	Permit Effective Date July 1, 2013
Sacramento Camp & Conference Center, Sacramento, NM – US54 to just north of Alamogordo, East on US82 to Mayhill, South on NM24, West on NM521 to Sacramento, follow signs to center on South side of 521, WWTP on left side of entrance road just below main building. Otero County	Exit Time/Date 8/29/18 12:51pm	Permit Expiration Date June 30, 2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ms. Loraine Gardner/Operator/575-687-3414 Mr. Bill McCuaig,/Executive Director/575-687-3414	Other Facility Data GPS: N 33° 47' 25" W -105° 33' 35" SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Bill McCuaig, Executive Director/575-687-3414 Sacramento Camp & Conference Center P.O. Box 8 Sacramento, NM 88347	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	S	Self-Monitoring Program	M	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s) Jennifer Foote /s/ Jennifer Foote	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0596	Date 9-24-18
Signature of Management QA Reviewer Sarah Holcomb, Program Manager /s/ Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 9-25-18

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS
DETAILS: **New permit has been issued and is effective 9/1/18**

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED no)

- | | |
|---|--|
| 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 4. ALL DISCHARGES ARE PERMITTED | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.
DETAILS:.

☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED Yes)

- | | |
|--|---|
| 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. | <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| b) NAME OF INDIVIDUAL PERFORMING SAMPLING | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| c) ANALYTICAL METHODS AND TECHNIQUES. | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| d) RESULTS OF ANALYSES AND CALIBRATIONS. | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA |
| e) DATES AND TIMES OF ANALYSES. | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA |
| f) NAME OF PERSON(S) PERFORMING ANALYSES. | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR | <input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA |
| 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA |

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.
DETAILS:

☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED Yes)

- | | |
|---|---|
| 1. TREATMENT UNITS PROPERLY OPERATED. | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| 2. TREATMENT UNITS PROPERLY MAINTAINED. | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. | <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. Manual system, operator lives onsite | <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE. | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. | <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. | <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA |
| STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA |
| PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA |

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? ☐ Y ☒ N ☐ NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? ☐ Y ☐ N ☒ NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? ☐ Y ☐ N ☒ NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? ☐ Y ☒ N ☐ NA
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? ☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED no).
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. ☒ Y ☐ N ☐ NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. ☐ Y ☐ N ☒ NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE ☒ Y ☐ N ☐ NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. ☐ Y ☐ N ☒ NA

b) PROPER PRESERVATION TECHNIQUES USED. ☐ Y ☐ N ☒ NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. **See Laboratory section below** ☐ Y ☒ N ☐ NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITEE'S SELF-MONITORING REPORT? ☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED Yes)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. ☐ Y ☒ N ☐ NA
 TYPE OF DEVICE 3 INCH PALMER-BOWLUS FLUME & GREYLINE ULTRASONIC FLOW METER

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. ☒ Y ☐ N ☐ NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. ☒ Y ☐ N ☐ NA

4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION installed August 2017) ☐ Y ☒ N ☐ NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. ☐ Y ☒ N ☐ NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. ☐ Y ☒ N ☐ NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. ☐ Y ☒ N ☐ NA

6. HEAD MEASURED AT PROPER LOCATION. ☒ Y ☐ N ☐ NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. ☒ Y ☐ N ☐ NA

SECTION F - LABORATORY

PERMITEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED Yes)
 DETAILS: TRC performed at facility, pH BOD, TSS performed offsite

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) ☒ Y ☐ N ☐ NA

SECTION F - LABORATORY (CONT'D)2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☐ M ☒ U ☐ NA4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☐ M ☒ U ☐ NA5. DUPLICATE SAMPLES ARE ANALYZED. ____% OF THE TIME. ☐ Y ☒ N ☐ NA6. SPIKED SAMPLES ARE ANALYZED. ____% OF THE TIME. ☐ Y ☒ N ☐ NA7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

Diagnostic & Technology Center, Inc.

LAB ADDRESS__ 2420-B N. White Sands Blvd, Alamogordo, NM 88310-6114

PARAMETERS PERFORMED TSS, BOD, E-Coli, pH

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED No).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	none	none	none	none	none	none	

RECEIVING WATER OBSERVATIONS: stream/spring was flowing

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.

☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED Yes).

DETAILS: Land disposal

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☒ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED ____).1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ____ METHOD _____ FREQUENCY _____

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

**Further Explanations
Sacramento Camp & Conference Center
NPDES Permit No. NM0028886
Inspection Date: August 29, 2018**

INTRODUCTION:

On August 29, 2018, Jennifer Foote of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB), accompanied by Amy Andrews of the U.S. Environmental Protection Agency (USEPA), conducted a Compliance Evaluation Inspection at the Sacramento Camp & Conference Center in Otero County, New Mexico. This facility is classified as a minor industrial discharger under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned the NPDES permit number NM0028886. The facility permitted design flow is 0.042 million gallons per day (MGD). This permit regulates discharge from outfall 001 to an unnamed intermittent stream, thence to Agua Chiquita Creek, thence to Rio Penasco (Segment 20.6.4.208 of the Pecos River Basin) of the New Mexico Administrative Code (NMAC). EPA has designated the uses of intermittent water for this permit (20.6.4.98 NMAC). The designated uses in 20.6.4.98 NMAC are livestock watering, wildlife habitat, marginal warmwater aquatic life and primary contact.

The NMED performs a certain number of inspections for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by NMED staff, and records and reports kept by the permittee and/or NMED.

INSPECTION DETAILS:

Upon arrival at the facility, the inspector made introductions, stated the purpose of the inspection and presented credentials to Ms. Loraine Gardner, the Wastewater Treatment Plant Operator. They reviewed paperwork in the office and then toured the facility. We also discussed changes that would need to occur when the new permit becomes effective. At the end of the tour, the inspector conducted an exit interview with Ms. Gardner and Mr. Bill McCuaig to discuss preliminary findings of the inspection.

TREATMENT SCHEME:

The WWTP serves the Camp & Conference Center as well as some homes. Homes downhill of the plant are served by septic systems, there are no lift stations. Flows occur year round but are greater in the summer months. The WWTP is a complete-mix, extended aeration package plant (Sanilogical Model) with chlorination/dechlorination capability. The plant consists of four reactor tanks that operate in series with four accessible surface ports per tank. The reactors include aeration diffusers and double-sided weirs. Two-thirds of the reactor is dedicated to aeration and the remaining portion functions as a clarifier. The blowers alternate on pre-programmed cycles. The plant has a two-day detention time for a total volume capacity of 76,000 gallons.

Following treatment in the reactors, wastewater flows into a chlorine contact chamber with chlorine tablets situated in vertical canisters. Dechlorination is provided by diphosphorus tablets in canisters set-up in a tank below the chlorine chamber. Both types of tablets are manually replaced as needed.

Flow is monitored by a 3 inch Palmer-Bowlus flume with a Greyline ultrasonic flow meter and totalizer.

SLUDGE:

Sludge is removed directly from the treatment plant on an as-needed basis by a private septage hauler for off-site disposal.

Section A –Permit – Overall Rating of “Satisfactory”.

OBSERVATIONS:

Facility had been issued an AO CWA-06-2018-1764 in April 2018 for not submitting WET tests and exceeding permit limits. In August 2018 EPA sent a letter that the response was satisfactory and the AO was closed.

The renewed permit takes effect on September 1. Changes from the current permit include an increase in the monitoring frequency for flow and pH and monitoring of Dissolved Oxygen (DO) was added to the permit.

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of “Marginal”.

Permit Requirements:

Part I A.1. Limitations and Monitoring requirements

Flow: Report 30-day avg, Daily Max, 7-day Average

USEPA Region 6 NPDES Reporting Requirements Handbook states:

How do I calculate and report 7-day averages? We recognize that calendar weeks and calendar months rarely coincide. Therefore, for the purpose of calculating and reporting 7-day averages, you should follow the process below: a. Define your week (SUN-SAT, MON-SUN, etc.). b. Calculate the averages of all sample data obtained for each week. c. The highest calculated weekly average will be reported on the DMR for the month in which (1) the week ends or (2) the week begins, or (3) the month which contains the greatest number of days. It is the choice of the facility. However, the choice should be consistent month to month, year to year.

Part III B. PROPER OPERATION AND MAINTENANCE

a. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.

Part III C.4.c. Record Contents

Records of monitoring information shall include:

c. The date(s) and times(s) analyses were performed;

Findings for Recordkeeping and Reporting Evaluation

- Permittee is reporting the same value for 30 day/monthly average and 7 day average for flow. (This is a repeat finding from 2013).
- Flow recorded on the bench sheet is cumulative flow, it was unclear how the maximum daily flow was calculated. Based on bench sheet provided for June 2018, the inspector calculated the greatest daily flow was .0467 MGD on June 11. The DMR for that month shows a max daily flow of .2301 MGD. If an error was made on the DMR, it should be resubmitted. Bench sheets should clearly show how the maximum daily flow was calculated.
- No bench sheets or written procedures were available to document what flows were used for the calculation for TSS and BOD loadings. The flow for the day the sample was taken must be used.
- Time of analyses was not available for BOD, TSS, e. Coli, or pH. Bench sheet shows only one time for TRC time of sampling and analysis.
- No calibration information was available for laboratory equipment.

Section C - Operations and Maintenance – Overall Rating of “Marginal”

Permit Requirements:

Part I E. POLLUTION PREVENTION REQUIREMENTS

The permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility.

The permittee shall consider the following items in the program:

c. The age and expected life of the wastewater treatment facility's equipment;

Part III B.3 PROPER OPERATION AND MAINTENANCE

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

Findings for Operations and Maintenance:

- Plant was built in 1970's and there is no estimate on the expected life of the facility.
- Facility currently has only one certified operator. There are no written procedures to assist back up staff.

Section E – Flow Measurement: “Marginal”

Permit Requirements:

Part III.C.6 (Flow Measurements) of the permit states:

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure that the accuracy of the

measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

Findings for Flow Measurement:

- The flow meter was last calibrated 8/29/17 when it was installed and is now due for an annual calibration. USEPA's NPDES Inspection Manual, Chapter 6 states, "The facility must ensure that their flow measurement systems are calibrated by a qualified source at least once a year to ensure their accuracy."
- The flume had some algae buildup which may lead to errors in measurement and should be cleaned.
- The flow meter should be checked monthly against the flume flow rate and must be calibrated when 10% off or annually.

Section F – Laboratory – Overall Rating “Marginal”

Permit requirements

Part III.C.5. MONITORING PROCEDURES

a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals

frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

Findings for Laboratory

- pH is not performed at the facility but is sent to the lab in Alamogordo. The lab report stated that pH is tested per Standard methods 4500-H+. The lab report does not include time of collection and time of analysis, the lab is located 45 miles away so they cannot be meeting the required 15 minute holding time as required by that method. A Chain of Custody form was not available. It was noted that the new permit does clearly state that pH must be done by instantaneous grab and analyzed within 15 minutes, whereas the current permit does not.
- Bench sheet states TRC is done by DPD Method but no written procedures were available.
- No records of calibration of instruments
- No records of quality control program including spikes and duplicates.

Section H – Sludge Disposal – Overall Rating “Marginal”

Permit requirements:

Part IV: Minor – Sewage Sludge Requirements, Element 2 – Surface Disposal,

Section I: Requirements Applying to All Sewage Sludge Surface Disposal,

Item A.3.: *In all cases, if the person (permit holder) who prepares the sewage sludge or supplies*

the sewage sludge to another person (owner or operator of a sewage sludge unit) for disposal in a

surface disposal site, the permit holder shall provide all necessary information to the parties who receive the sludge to assure compliance with these regulations.

40 CFR 503.7 Requirement for a person who prepares sewage sludge: *Any person who prepares*

sewage sludge shall ensure the applicable requirements in this part are met when the sewage sludge is applied to the land, placed on a surface disposal site, or fired in a sewage sludge incinerator. ("Person" is defined as an individual, association, partnership, corporation, municipality, State or Federal agency, or an agent or employee thereof.)

503.27 Recordkeeping, (a) *When sewage sludge (other than domestic septage) is placed on an active sewage sludge unit: (1) The person who prepares the sewage sludge shall develop the following information and shall retain the information for five years.*

(i) The concentration of each pollutant listed in Table 1 of §503.23 in the sewage sludge when the pollutant concentrations in Table 1 of §503.23 are met.

(ii) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the pathogen requirements in (insert §503.32(a), §503.32(b)(2), §503.32(b)(3), or §503.32(b)(4) when one of

those requirements is met) and the vector attraction reduction requirement in (insert one of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) if one of those requirements is met) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(iii) A description of how the pathogen requirements in §503.32 (a), (b)(2), (b)(3), or (b)(4) are met when one of those requirements is met.

(iv) A description of how one of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) is met when one of those requirements is met.

Findings for Sludge Disposal:

- The permittee was unable to show any sludge sampling records for other than a receipt for hauling.

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Jennifer Foote	Date: 8-29-18	Time: 11:35am
City/County: Sacramento/Otero County		State: New Mexico
Location: Sacramento Camp and Conference Center		
Subject: algae in flume		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Jennifer Foote	Date: 8-29-18	Time: 11:30am
City/County: Sacramento/Otero County		State: New Mexico
Location: Sacramento Camp and Conference Center		
Subject: discharge location		

